# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA SAVANNAH DIVISION CR 4 2 3 - 00 1 4

UNITED STATES OF AMERICA	) INDICTMENT NO.
	)
v.	) 18 U.S.C. § 924(c)
	) Possession of a Firearm in
MELVIN BRINSON	) Furtherance of a Drug
	) Trafficking Crime
	)
	) 21 U.S.C. § 841(a)(1)
	) Possession with Intent to
	) Distribute a Controlled
	) Substance (Methamphetamine)
	,

# THE GRAND JURY CHARGES THAT:

#### COUNT ONE

Possession with Intent to Distribute a Controlled Substance (Methamphetamine) 21 U.S.C. § 841(a)(1)

On or about June 7, 2022, in Chatham County, within the Southern District of Georgia, the defendant,

# MELVIN BRINSON,

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).



#### **COUNT TWO**

Possession of a Firearm in Furtherance of a Drug Trafficking Crime 18 U.S.C. § 924(c)

On or about June 7, 2022, in Chatham County, within the Southern District of Georgia, the defendant,

# MELVIN BRINSON,

did knowingly possess a firearm, to wit, a Ruger, Model SR40 .40 caliber pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession with Intent to Distribute a Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 1 of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

# FORFEITURE ALLEGATIONS

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense set forth in Count One of this Indictment, the defendant, MELVIN BRINSON, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s), including but not limited to, a Ruger Model SR40 .40 caliber pistol, bearing serial number 345-10360 and 49 rounds of .40 caliber ammunition.

Upon conviction of the offense set forth in Count Two of this Indictment, the defendant, MELVIN BRINSON, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense(s), including, but not limited to, a Ruger Model SR40 .40 caliber pistol, bearing serial number 345-10360 and 49 rounds of .40 caliber ammunition.

If any of the property described above, as a result of any act or commission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill.

David H. Estes

United States Attorney

Marcela C. Mateo

Assistant United States Attorney

\*Lead Counsel

Patricia G. Rhodes

Assistant United States Attorney

Chief, Criminal Division

Makeia R. Jonese

Special Assistant United States

Attorney

\*Co-Counsel